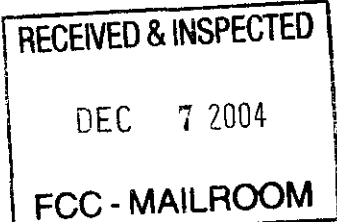


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Your Telecom SmartPartner™

December 2, 2004

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EX PARTE COMMUNICATION

Chairman Michael Powell
Federal Communications Commission
The Portals
445 12th Street, S.W., TW-A325
Washington, DC 20554

ORIGINAL

Re: Access to Unbundled Network Elements, WC Docket No. 03-225

Dear Chairman Powell:

I am a founder and Chief Financial Officer of Intera Group, Inc. I am writing to urge you, in taking action on the pending revision of the Unbundled Network Element (UNE) rules, to ensure that payphone companies like mine continue to have competitive alternatives for their local service needs. Intera, headquartered in Pleasanton, California, through its three wholly-owned payphone service providers: NSC Communications Public Services Corporation, Goldentel, Inc. and West Coast Coin, Inc., currently employs 185 full-time employees and owns and operates 28,000 payphones in the States of California, Washington, Oregon, Nevada, Arizona, Texas, Hawaii, Georgia, Alabama and Florida.

As the Commission has long recognized, payphones play a critical role in meeting the needs of the public for communications on the move – especially in emergencies and in disasters such as 9/11. And for many citizens, payphones are the only telephones they can use. That is why Congress mandated wide availability of service in the Telecommunications Act. To continue in providing payphone services, my company must have reliable local service connections at a reasonable cost. This is so because my local phone bill is my single largest monthly cost of operating my phones. To keep service quality high and costs low, we rely on the availability of competitive telephone companies for local service. Without competitive local service options like UNE-P, there is no market check on what we may be charged by the incumbent telephone company.

[Handwritten signature]

For our payphones, the only competitive alternative that has proved effective to date is UNE-P. Approximately eighty-five percent of our payphones utilize CLECs under UNE-P rules. Our payphones do not transmit data and do not need broadband channels; thus, broadband facilities do not provide a viable competitive alternative for our payphones. In the last few years, we have removed thousands of our payphones from service for profitability reasons. Without UNE-P, the problem will only worsen with the American public losing more of the valuable payphone services they need and rely on today.

Therefore, I urge you to take steps to ensure that the FCC's revised UNE rules preserve competitive local service alternatives for payphones. Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script, appearing to read "M. Sean Venezia".

M. Sean Venezia
Chief Financial Officer

cc: Marlene H. Dortch, FCC Secretary
Senator Barbara Boxer
Senator Dianne Feinstein
Congressman Richard Pombo
Robert Aldrich